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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 IN RE SEAGATE TECHNOLOGY LLC
LITIGATION

No. 5:16-cv-00523-RMW

18 STIPULATION AND [PROPOSED]
19 ORDER VOLUNTARILY DISMISSING
20 PLAINTIFF ADAM GINSBERG
WITHOUT PREJUDICE PURSUANT
TO CIVIL PROCEDURE RULE 41(a)(1)

Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, it is hereby stipulated and agreed, by and between the parties, that plaintiff Adam Ginsberg is dismissed, without prejudice and without costs. This voluntary dismissal of Adam Ginsberg does not affect any of the claims made in the Second Consolidated Amended Complaint (ECF No. 62).

In agreeing to this voluntary dismissal, Defendant does not waive its rights under the Federal Rules of Civil Procedure, including Rules 45 and 26, to seek discovery from Mr. Ginsberg as a percipient witness/absent member of the putative class. Similarly, Plaintiffs do not waive their right to seek a protective order under Rule 26 preventing any such discovery.

DATED: July 26, 2016

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A Limited Liability Partnership
Including Professional Corporations

DATED: July 26, 2016

By: /s/ Anna S. McLean

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

UNITED STATES DISTRICT JUDGE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Steve W. Berman, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order Voluntarily Dismissing Plaintiff Adam Ginsberg Without Prejudice Pursuant to Civil Procedure Rule 41(a)(1). In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: July 26, 2016

By: /s/ Steve W. Berman
Steve W. Berman

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2016, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

/s/ Steve W. Berman
STEVE W. BERMAN